

EXHIBIT B

IN THE LACKAWANNA COUNTY
COURT OF COMMON PLEAS
STATE OF PENNSYLVANIA

GENEEN WILSON,

Plaintiff,

Case No.: 2023-3323

v.

ABILITY RECOVERY SERVICES, LLC,

Defendant.


NOTICE OF FILING NOTICE OF REMOVAL

PLEASE TAKE NOTICE that this action has been removed to the United States District Court for the Middle District of Pennsylvania. Attached hereto as Exhibit "1" is a copy of the Notice of Removal filed in the United States District Court, Middle District of Pennsylvania effecting such removal.

PLEASE TAKE FURTHER NOTICE that, pursuant to 28 U.S.C. § 1446, the filing of the Notice of Removal in the United States District Court, together with the filing of a copy of such Notice with this Court, effects the removal of this action and this Court may proceed no further unless and until the case is remanded.

Dated: September 20, 2023

Respectfully Submitted,



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*Attorney for Defendant,
Ability Recovery Services, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2023, a copy of the foregoing *Notice of Filing Notice of Removal* was filed with the Clerk of the Court, Court of Common Pleas of Lackawanna County and was served via U.S. Mail upon the following:

Clerk of the Court
Court of Common Pleas
Lackawanna County Courthouse
200 N. Washington Avenue
Scranton, PA 18503

Brett Freeman, Esq.
FREEMAN LAW
210 Montage Mountain Road
Moosic, PA 18507



Aaron R. Easley, Esq.